

# COHEN & GREEN

April 10, 2024

Hon. Valerie Figueredo, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

By Electronic Filing.

**Re: Rodriguez et al v. City of New York, et. al., 21-cv-10815 (PKC)**

Dear Judge Figueredo:

As the Court may recall, I am co-counsel for Plaintiff in the case above. As discussed at the most recent conference, the parties have conferred and figured out timing for the items the Court directed at that conference. Defendants have represented they will be able to serve everything on or before June 21, 2024.

As also discussed at the conference, that means the discovery end date will need to move out substantially. The current end date is April 15, 2024. *See* ECF No. 77. In order to keep enough time to address the updated responses and complete other discovery (since the reason for the time it is taking to complete the items directed is that Defendants' counsel is on a very busy trial calendar), the parties respectfully request 90 days from June 21, 2024 — that is, until September 19, 2024 — to complete non-expert discovery. This is the third request for an extension of time to complete fact discovery.

As ever, we thank the Court for its time and attention.

Respectfully submitted,

/s/

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J. Remy Grfeen

*Honorific / Pronouns: Mx. / they, their, them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by electronic filing.